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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
  
Plaintiff;  
  
vs.  
  
TERRY WILLIAMSON, *et al.*,  
  
Defendants.

CASE NO.: 2:15-cr-127-RFB

**DEFENDANT'S UNOPPOSED MOTION  
FOR TEMPORARY RELEASE OF  
PASSPORT AND PROPOSED ORDER**

Defendant Terry Williamson, by and through her attorneys of record, Kathleen Bliss, Esq., and Jason Hicks, Esq., hereby submits this motion requesting the Court enter an order directing Pretrial Services to release, temporarily, the expired passport of Mr. Williamson so that he can renew it and then return it to Pretrial Services. Mr. Williamson requires a current passport in the event of a family emergency. Mr. Williamson understands and accepts that he could use his passport, even in the event of a family emergency, only with the approval of this Court. Here is the background of the case.

On April 29, 2015, a federal grand jury sitting in the District of Nevada returned an indictment against Ronald Kelly, charging him, *inter alia*, with conspiracy to commit fraud. The grand jury returned a superseding indictment on October 21, 2015, charging additional defendants, including Mr. Williamson. While the superseding indictment alleges eighty-one counts, Mr. Williamson is charged only in the conspiracy count alleged in count one. *See* Dkt. 5.

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1 On November 6, 2015, federal agents arrested Mr. Williamson at his workplace, Grand  
2 Canyon Caverns, Seligman, Arizona, where he is a manager. Nonetheless, the government did  
3 not seek detention of Mr. Williamson. The magistrate judge ordered Mr. Williamson released on  
4 a personal recognizance bond. *See* Minutes of Proceedings, Dkt. 40. Trial in this case is  
5 currently set on May 17, 2016.

6 Mr. Williamson is a citizen of Canada, but he has lived and worked in the United States  
7 for the past 20 years. His passport expired in early February 2016. Mr. Williamson's mother is  
8 90 years old, and her health is fragile. In the event that she falls ill, Mr. Williamson would like to  
9 apply for travel and see her and take care of her affairs. Mr. Williamson understands fully that  
10 he cannot travel without this Courts approval. Furthermore, he understands that Pretrial Services  
11 would hold his passport until and unless this Court's orders its temporary release for travel. In  
12 the meantime, Mr. Williamson must have the expired passport to prepare and obtain a current  
13 passport. As such, Mr. Williamson requests that the Court order the temporary release of the  
14 expired passport for the sole purpose of using it for renewal, then it return the current passport to  
15 Pretrial Services unless and until he requests permission of this Court for emergency travel.

16 Counsel for the government, Kathryn Newman, has **no objection** to this motion.

17 Dated this 8th day of April 2016.

18 Respectfully Submitted,

19 KATHLEEN BLISS LAW PLLC  
20

21 /s/ Kathleen Bliss

22 KATHLEEN BLISS, ESQ.

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**ORDER**

Upon review of Terry Williamson's motion for temporary release of passport, and good cause appearing, it is hereby ORDERED, ADJUDGED, and DECREED that the U.S. Pretrial Services Office is directed to release Mr. Williamson's passport to Mr. Williamson or his counsel for the purpose of renewing it. Upon completion of the application, Mr. Williamson shall immediately return his renewed passport to Pretrial Services.

Dated this 26th day of April, 2016.



RICHARD F. BOULWARE, II  
United States District Judge

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**CERTIFICATE OF SERVICE**

In accordance with Rule 49(c) of the Federal Rules of Criminal Procedure and Rule 47-11 of the Local Rules of Practice of the United States District for the District of Nevada, I certify that I am an employee of KATHLEEN BLISS LAW PLLC, and that on this 6th day of April 2016, I did cause a true copy of:

**DEFENDANT'S MOTION FOR RELEASE OF PASSPORT AND PROPOSED ORDER**

To be served via electronic service by the U.S. District Court CM/ECF system to the parties on the Electronic Filing system in this action.

By: /s/ Sylvia Bishai  
An employee of KATHLEEN BLISS LAW PLLC

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